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STARBUCKS CORPORATION,
13 doing business as STARBUCKS
COFFEE COMPANY

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16 UNITED STATES DISTRICT COURT
17 NORTHERN DISTRICT OF CALIFORNIA
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19 MA JANETTE MEDRANO, an individual,

20 Plaintiff,

21 v.

22 STARBUCKS CORPORATION, a
Washington corporation doing business in
23 California; STARBUCKS COFFEE
COMPANY, a Washington corporation doing
24 business in California; and DOES 1-50,
inclusive,

25 Defendants.
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CASE NO. 4:11-cv-04846-YRG

**JOINT STIPULATION AND ~~[PROPOSED]~~
ORDER RESCHEDULING
SETTLEMENT CONFERENCE**

Date: May 10, 2012
Time: 9:00 a.m.
Judge: Hon. Kandis A. Westmore

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28 {100011512}

1 Plaintiff Ma Janette Medrano (hereinafter "Plaintiff") and Defendant Starbucks
 2 Corporation, doing business as Starbucks Coffee Company (hereinafter "Starbucks" or
 3 "Defendant") hereby submit this Joint Stipulation and [Proposed] Order requesting a rescheduling
 4 of the settlement conference currently scheduled for May 10, 2012. As set forth below, the parties
 5 had to reschedule Plaintiff's deposition in order to provide Plaintiff with additional time to procure
 6 and turn over her Employment Development Department ("EDD") records, which to date have not
 7 been forthcoming from the EDD office. As a result, the parties ask to reschedule their mandatory
 8 settlement conference until July 11, 2012 or July 12, 2012.

9 1. Honorable Judge Yvonne Gonzalez Rogers initially referred this matter for a
 10 mandatory settlement conference to Magistrate Judge Bernard Zimmerman for settlement
 11 purposes and the parties and the Court agreed to a settlement conference of May 10, 2012. (Dkt.
 12 No. 22.) This date was selected to accommodate the scheduling of Plaintiff's deposition for April
 13 19, 2012, as each party believes that a settlement conference will be most meaningful after the
 14 completion of Plaintiff's deposition and limited discovery.

15 2. On February 24, 2012, Starbucks initially informed Plaintiff's counsel that it would
 16 be seeking Plaintiff's EDD files for disability and unemployment benefits. The parties disagreed
 17 over what EDD records should be released and sought judicial intervention after their meet and
 18 confer efforts were unsuccessful. Thereafter, on March 21, 2012, this Court ordered Plaintiff to
 19 request the records in dispute from the EDD and produce relevant portions of the EDD records and
 20 a log identifying the nature of any documents not produced by April 12, 2012 – "based on the
 21 Court's understanding that these records are needed for Plaintiff's deposition noticed for April 19,
 22 2012." (Dkt. No. 32.) The Court also wrote: "If the records cannot be obtained from the EDD and
 23 produced pursuant to the above timeframe, the Court encourages the parties to meet and confer
 24 regarding additional dates." (*Id.*)

25 3. As a result of the Court's order, counsel for Plaintiff submitted a request to the
 26 EDD for Plaintiff's files. To date, Plaintiff's counsel has not received a response from the EDD
 27 and is trying to contact the EDD to check the document release status. At this time, counsel for
 28 Plaintiff is not certain when Plaintiff will receive her EDD records.

1 4. Accordingly, the parties agreed to reschedule Plaintiff's April 19th deposition.
2 Although the parties do not know when the EDD will release Plaintiff's files, the parties are
3 optimistic that the files will be forthcoming in the next three weeks. Taking into consideration the
4 time it may take the EDD to respond, Plaintiff's counsel's time to review those records, and
5 Plaintiff's counsel's preplanned vacation from May 23rd to June 4th, the parties met and conferred
6 and agreed to reschedule Plaintiff's deposition to June 14, 2012.

7 5. The parties jointly submitted a stipulation to Judge Yvonne Gonzalez Rogers
8 requesting additional time to complete their mandatory settlement conference. (Dkt. No. 33.)
9 Pursuant to the stipulation, the Court ordered that the deadline for the parties' mandatory
10 settlement conference before a Magistrate Judge to occur by will be extended to July 31, 2012.
11 (Dkt. No. 34.)

12 6. On April 25, 2012, this case was referred to Magistrate Judge Kandis A. Westmore
13 for settlement purposes.

14 7. Counsel for the parties each believe that a settlement conference will be most
15 meaningful after the completion of Plaintiff's deposition and limited discovery.

16 8. Counsel for the parties met and conferred and mutually agreed to reschedule the
17 settlement conference for Wednesday, July 11, 2012 or Thursday, July 12, 2012, when all parties
18 are available.

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1 The parties hereby respectfully submit a joint request that the Court reschedule the
2 settlement conference to July 11, 2012 or July 12, 2012.

3 SO STIPULATED:

4 Dated: April 27, 2012

LAW OFFICES OF DANIEL FEDER

6 By /s/ Qian Sun
DANIEL FEDER
QIAN SUN

8 Attorneys for Plaintiff
MA JANETTE MEDRANO

11 Dated: April 27, 2012

VILLARREAL HUTNER & TODD PC

13 By /s/ Jessica N. Leal
LARA VILLARREAL HUTNER
JESSICA N. LEAL

15 Attorneys for Defendant
STARBUCKS CORPORATION,
doing business as STARBUCKS
COFFEE COMPANY

17 **ATTESTMENT OF CONCURRENCE PER GENERAL ORDER 45 FOR FILING:**

18 I attest that concurrence in the filing of this document by the signatory Qian Sun, has been
19 obtained, and that a record of the concurrence shall be maintained by Villarreal Hutner & Todd
20 PC.

21 I declare under penalty of perjury pursuant to the laws of the United States of America that
22 the foregoing is true and correct.

23 Executed at San Francisco, California this 27th day of April, 2012.

26 /s/ Jessica N. Leal
JESSICA N. LEAL

1 IT IS SO ORDERED:

2 The stipulation of the parties to reschedule the May 10, 2012 settlement conference is
3 approved and hereby adopted as the Order of the Court. The settlement conference is rescheduled
4 for [Wednesday, July 11, 2012] ~~[Thursday, July 12, 2012]~~ ~~[or, alternatively, _____,~~
5 ~~2012]~~ at 11:00 am.

6
7 Dated: April 30, 2012

By


Magistrate Judge Kandis A. Westmore